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7 *Attorneys for Defendant*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 WNDG, LLC, an Arizona limited liability
11 company,

CASE NO.: 2:24-cv-00263-CDS-BNW

12 Plaintiff,

13 || vs.

14 Susan Lantow as Trustee of The Susan Lantow
Living Trust Dated May 26, 2006.

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
TO ANSWER OR RESPOND TO
PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff WNDG, LLC ("Plaintiff"), through its undersigned counsel of record and Defendant Susan Lantow as Trustee of The Susan Lantow Living Trust Dated May 26, 2006 ("Defendant"), through her undersigned counsel of record, as follows:

21 1. On February 6, 2024, Plaintiff filed its Complaint alleging claims for relief for
22 breach of contract and negligent misrepresentation against Defendant. ECF 1.

23 2. On or about March 17, 2024, Plaintiff allegedly served the Summons and
24 Complaint on Defendant, ECF 10.

25 3. Defendant was unable to retain counsel to respond to the Complaint until April 2,
26
2024.

1 4. Accordingly, pursuant to LR IA 6-1(a), the Parties wish to extend the deadline for
2 Defendant to respond to the Complaint by approximately 4 days in order to allow Defendant's
3 counsel to adequately investigate the facts and prepare a responsive pleading.

4 5. For these reasons, the Parties stipulate and agree that Defendant shall have up to
5 and including April 12, 2024, within which to file her response to Plaintiff's Complaint.

6 6. No discovery deadlines or dates for trial have been set.

7 7. This is the Parties' first request to extend Defendant's response deadline.

8 8. This stipulation is brought in good faith by the Parties and not for purposes of
9 delay.

10 **IT IS SO STIPULATED.**

11 DATED this 8th day of April, 2024.

12 HOLLEY DRIGGS

13 _____
14 /s/ Don C. Fletcher

15 R. McKay Holley, Esq.
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Las Vegas, NV 89101
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16 -and-

17 FLETCHER BARNES LAW, PLC
18 Don C. Fletcher, Esq.
Arizona Bar No. 012140
10429 South 51st Street, Suite 225
Phoenix, Arizona 85044
Attorneys for Plaintiff

19 _____
20 /s/ Johnathon Fayeghi

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Attorneys for Defendant

22 **IT IS SO ORDERED.**

23 
UNITED STATES MAGISTRATE JUDGE

24 DATED: 4/9/2024

From: John Fayeghi
Sent: Monday, April 8, 2024 2:38 PM
To: Amanda Brandon
Cc: Frederic Berkley

From: Don Fletcher <dfletcher@FletcherBarnesLaw.com>
Sent: Monday, April 8, 2024 2:04 PM
To: John Fayeghi <jfayeghi@sklar-law.com>
Cc: McKay Holley <mholley@nevadafirm.com>
Subject: FW: WNDG, LLC v. Susan Lantow as Trustee of The Susan Lantow Living Trust Dated May 26, 2006 (Case 2:24-cv-00263)

External Email

John:

Yes, you have our permission to sign and file with the Court.

Thank you.

Don C. Fletcher
FLETCHER BARNES LAW PLC
10429 South 51st Street, Suite 225
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From: John Fayeghi <jfayeghi@sklar-law.com>
Sent: Monday, April 8, 2024 9:52 AM
To: Don Fletcher <dfletcher@FletcherBarnesLaw.com>; mholley@nevadafirm.com
Cc: Frederic Berkley <fberkley@sklar-law.com>; Amanda Brandon <aブランドン@sklar-law.com>; Timothy Barnes <tbarnes@FletcherBarnesLaw.com>
Subject: RE: WNDG, LLC v. Susan Lantow as Trustee of The Susan Lantow Living Trust Dated May 26, 2006 (Case 2:24-cv-00263)

Don,